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Attorneys for Third-Party Defendant, Kingstec Industries Inc.  
21575.1-0002 RMK

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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Plaintiff	:	
DR. MILTON PRYSTOWSKY, in his own right and as EXECUTOR OF THE ESTATE OF ROSE PRYSTOWSKY	:	No.: 2:07-cv-0072 (SDW) (MCA)
vs.	:	NOTICE OF KINGSTEC INDUSTRIES INC.'S MOTION TO DISMISS THE THIRD PARTY COMPLAINT OF PRIDE MOBILITY PRODUCTS CORP FOR LACK OF PERSONAL JURISDICTION
Defendants	:	
TGC STORES, INC., ADT SECURITY SERVICES, INC., INVACARE CORPORATION, GOLDEN BROTHERS, INC. d/b/a GOLDEN TECHNOLOGIES, PRIDE MOBILITY PRODUCTS CORP.	:	
and	:	
Defendant/Third-Party Plaintiff	:	
Pride Mobility Products Corp.	:	
vs.	:	
Third-Party Defendants	:	
DEWERT MOTORIZED SYSTEMS, PHOENIX MECANO, INC. and KINGSTEC INDUSTRIES, INC.	:	
	:	

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SIRS:

PLEASE TAKE NOTICE that the undersigned counsel for the third party defendants, Kingstec Industries Inc., will move before the United States District Court for the District of New Jersey, in

Newark, New Jersey, for a Motion Dismissing Plaintiff's Complaint based on lack of personal jurisdiction.

In support of the Motion, the movant shall rely upon the annexed Statement of Material Facts.

Oral argument is hereby requested.

A Proposed Form of Order is submitted herewith.

DATED: December 11, 2009

/s/Robert M. Kaplan

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